

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

ASHLEY T. JONES, 216506)	
)	
PLAINTIFF,)	CIVIL ACTION: CV- 2:05731-F
v.)	
)	
WARDEN GLADYS DEESE (Individually)	
and Official Capacity), DEPUTY WARDEN)	
FRANK ALBRIGHT (Individually and)	
Official Capacity),)	
)	
DEFENDANT(S))	

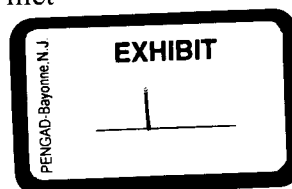
AFFIDAVIT

Before me, the undersigned Notary Public, did personally appear Gladys S. Deese, who being duly sworn deposes and makes the following statement:

My name is Gladys S. Deese. I am an individual over the age of nineteen years and am employed by the State of Alabama, Department of Corrections, at Julia Tutwiler Prison for Women, 8966 U.S. Highway 231, Wetumpka, Alabama. I am employed in the capacity of Warden III. I have read the complaint in the above referenced case. I make the following statement:

I deny any claim that I have threatened, harassed, or violated any of Inmate Ashely Jones, AIS # 216506's, constitutional rights. Institutional job assignments are made by the Job Board in accordance with Administrative Regulation 444. Inmate Jones has been assigned to fifteen different jobs since her incarceration (see Job History Processing).

The fact of the matter is that Inmate Jones was removed from her assigned job as GED tutor due to security reasons, not her length of time on the job. Inmate Jones was advised that she may attend J. F. Ingram Technical College if security needs are met



and she could afford to pay the \$90.00 per credit hour. Inmate Jones continues to state she wants to attend, however, she has failed to submit a written request stating she is financially able to pay the tuition and has not completed a disbursement form. Inmate Jones' current Prison Money On Deposit - PMOD – is \$56.04. Inmate Jones has had knowledge of this requirement since March of 2003.

J. F. Ingram is a separate facility and is not a part of Tutwiler Prison perimeter. I did meet with Inmate Jones on July 15, 2005, to inquire why she was in the Central Hall area a majority of the time and to ascertain her job assignment.

Inmate Jones was instructed that she needed to follow proper protocol by requesting to attend J. F. Ingram Technical College and her ability to pay the required tuition. She has failed to do so as evidenced by her request on July 12, 2005.

Gladys Deere Affiant

Sworn to and subscribed before me this 19 day of September 2005.

M. W. Sumlison Notary Public

My commission expires 06/21/2009